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TO: State Board of Education Members  
FROM: Margaret R. Bush MSN, RN, CNS, BC  
DATE: June 21, 2006  
RE: Administrative Code 6A:16.2 Programs to Support Student Services

Good afternoon. My name is Margaret Bush and I am the current President of the New Jersey State School Nurses Association. I am here to speak in opposition to the removal of the wording "full time equivalent" from the certified school nurse requirement in the proposed change to Administrative Code 6A Chapter 16, Programs to Support Student Services.

Nurses were first placed in public schools to protect children by identifying and removing from the schools those students who were ill and whose illness could threaten the health of the rest of the school population. These nurses acted on behalf of the total school community and by their ability to separate the healthy from the ill they were able to positively affect the attendance of students in schools. Later, it was realized that these nurses needed to understand more about the institution and the principles of education and how good health reflected on the success of each student as well as the school educational program. So we now have certified school nurses who are specialists in how medicine can combine with education for the greater welfare of the community. Healthy students learn. Removing the "full time" wording will create a less healthy environment for our students because a certified school nurse will not be available to them every minute of every school day.

You have recently received many letters from certified school nurses who work in the public schools of New Jersey. These certified school nurses, who are professionals and specialists in their field, have informed you of the necessity to keep the words "full time equivalent" preceding "certified school nurse" in this section of the Code. I am sure that their written testimonies describe the difficulties and medical challenges that they face daily in the care of their students. They question how the State Board of Education members can think that the responsibilities of a full time certified school nurse could be accomplished on a part-time basis? They are also realists and understand that school district's budgets are tight. It is not such a stretch of the imagination to realize that some school districts, when they are told that they are no longer required to employ a full time certified school nurse, will reduce the full time status of the school nurse to a part-time position without benefits and hire less qualified personnel in their place.

It has been said that in the Code the words "full time" and "full time equivalent" are not used preceding the requirements for employment of school physicians, teachers, administrators, social workers, and other professional people in the school districts. Perhaps the writers of the code assumed that school districts would not think of hiring these other professionals on a part-time basis. Since the code did express that certified school nurses would be



employed on a full time basis we should also assume that there was a question once before about the necessity for a full time certified school nurse for every school district in NJ. Removing the "full time" wording will create the opportunity for every district to employ part-time certified school nurses when the true intent for this change in the proposed code language is not to cut these services in half in every district in NJ.

Some argue that there is a shortage of certified school nurses. What do you think will happen if the available school nurse positions become part-time without benefits? I would imagine many of those nurses who are certified in school nursing will be looking for a full time position with benefits in another area of nursing. Removing the full time wording will create an authentic shortage of certified school nurses.

It seems that the problem that these small school districts and special education schools have, lies with the Department of Education's Waiver and Equivalency process and not with their inability to employ a full time equivalent certified school nurse for their special schools. It is not up to the New Jersey State School Nurses Association leadership or the AHSA to determine how this problem among the smaller school districts and the special education schools can be solved without removing the full time wording from the proposed administrative code. It is the Department of Education's **responsibility to develop** regulations to CLARIFY the educational statutes. Instead, by removing the full time wording you will create more chaos in school districts which must adhere to the Department of Education's mandated school health requirements as well as those of the New Jersey Department of Health and Senior Services' Sanitary Code.

For of these reasons, for all the reasons that my colleagues stated in their testimonial letters, but most of all, for the health and welfare of our students, The New Jersey State School Nurses Association respectfully asks you to return the full time equivalent wording to the Administrative Code.

Thank you.



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